

ORIGINAL

OPEN MEETING
MEMORANDUM



Arizona Corporation Commission

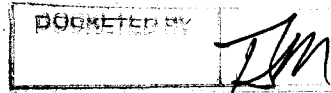
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JAN 15 2013

TO: THE COMMISSION

FROM: Utilities Division

DATE: January 15, 2013



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ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

RE: IN THE MATTER OF THE APPLICATION OF Q LINK WIRELESS LLC FOR APPROVAL OF A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF ARIZONA ON A WIRELESS BASIS (LOW INCOME ONLY). (DOCKET NO. T-20824A-11-0446)

1. PROCEDURAL HISTORY

On December 13, 2011, Q Link Wireless LLC ("Q Link") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to section 214(e)(2) of the Communications Act of 1934 (the "Act") and the rules of the Federal Communications Commission ("FCC"), including 47 C.F.R. §§ 54.201 through 54.207. In its Application, Q Link requests that the Arizona Corporation Commission ("ACC" or "Commission") designate it as a wireless ETC for the purpose of receiving federal Universal Service Fund ("FUSF") support for low-income customers only (i.e., Lifeline¹). Q Link is not requesting high cost support.

On February 9, 2012, Q Link filed an amendment to its application to withdraw its request for Link Up reimbursement.

On February 10, 2012, Q Link submitted its initial Compliance Plan to the FCC in order to benefit from the "blanket forbearance" of the own-facilities requirement used to provide Lifeline services.

On March 9, 2012, the Arizona Local Exchange Carriers Association ("ALECA") filed a motion to intervene.

On March 30, 2012, a Procedural Order granted ALECA's request for intervention in this proceeding.

On August 8, 2012, the FCC approved Q Link's Third Revised Compliance Plan ("TRCP") and waived the company owned-facilities requirement. On August 10, 2012, Q Link filed a copy of the TRCP in the docket.

On November 8, 2012, a Stipulation between ALECA and Q Link was filed in the docket.

¹ Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. The federal support amount provided to an ETC is \$9.25.

2. BACKGROUND

Q Link is a Delaware Limited Liability Company organized on August 25, 2011. Its principal office is located at 499 Sheridan Street, Suite 300, Dania, Florida 33004. Q Link provides Commercial Mobile Radio Service (“CMRS”) through the resale of service of other wireless carriers. Q Link currently serves just under 5,000 customers² in the states in which it operates, of which 90% are Lifeline customers. Q Link has been granted wireless ETC designation in nine (9) jurisdictions³ with seventeen (17) applications pending in other jurisdictions.⁴ Q Link states⁵ it will provide wireless service through a “virtual network” provider, Boomerang Wireless, LLC dba Ready Mobile (“Ready Mobile”), consisting of services obtained from licensed wireless network operator Sprint PCS (“Sprint”) and does not own or operate any of its own wireless facilities. Q Link’s arrangement through Ready Mobile and its underlying wireless carrier Sprint enables it to offer services wherever the underlying wireless carriers offer service in the State of Arizona. Both non-rural and rural incumbent local exchange carriers (“ILECs”) provide wireline service within these areas. For its proposed designated service area, Q Link provided a list of zip codes in which it will provide service and identified the ILEC(s) serving each zip code in its proposed tariff⁶ (See Attachment 1).

On February 6, 2012, the FCC released an Order in FCC 12-11, *Lifeline and Link Up Reform and Modernization* (“*Lifeline Reform Order*”),⁷ in which the FCC adopted comprehensive reforms to the low-income program to revise and modernize the Lifeline service requirements and implement measures to address fraud, waste and abuse of the FUSF. Within that Order, the FCC found that a grant of blanket forbearance of the requirement that an ETC use its own facilities (“the facilities requirement”) subject to certain public safety and compliance obligations, was appropriate for carriers seeking to provide Lifeline-only service.⁸ Specifically, in the *Lifeline Reform Order*, the FCC states it will conditionally grant forbearance from the Act’s Section 214(e)(1)(A) facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements; and (2) FCC Wireline Competition Bureau approval of a compliance plan providing specific information regarding the carrier and

² Response to Staff Data Request STF 2.1.

³ Colorado, Maryland, Michigan, Missouri, Nevada, Oklahoma, Texas, West Virginia and Wisconsin.

⁴ Arkansas, California, Georgia, Illinois, Kansas, Kentucky, Louisiana, Maine, Massachusetts, Minnesota, Mississippi, New Jersey, Ohio, Pennsylvania, South Carolina, Utah, and Federal ETC designation for Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia and the District of Columbia.

⁵ Response to Staff Data Request STF 1.15.

⁶ Response to Staff Data Request STF 1.52.

⁷ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 (“*Lifeline Reform Order*”).

⁸ *Ibid.*, at ¶¶ 368-381.

its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.⁹

On February 10, 2012, Q Link submitted its initial Compliance Plan to the FCC in order to benefit from the “blanket forbearance” of the own-facilities requirement used to provide Lifeline services. Q Link submitted its TRCP on June 30, 2012, making changes as the result of discussions with FCC Staff. On August 8, 2012, in DA 12-1286, the FCC issued a Public Notice¹⁰ approving Q Link’s June 30, 2012 TRCP.

3. REQUIREMENTS FOR DESIGNATION AS AN ETC AND Q LINK’S COMPLIANCE WITH THE REQUIREMENTS

Designation as an ETC makes a carrier eligible to receive federal universal service funds. The requirements for designation of ETCs are specified by federal law in 47 U.S.C. § 214(e)(1), which states:

“A common carrier designated as an eligible telecommunications carrier under paragraph (2) or (3) shall be eligible to receive universal service support in accordance with section 254 and shall throughout the service area for which the designation is received: (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the corresponding charges using media of general distribution.”

In order to be designated as an ETC, a carrier must offer Lifeline service to all qualifying low-income customers within its service area.¹¹ Lifeline service provides basic telephone service, typically by passing on discounts to monthly telecommunications charges. As a wireless reseller of prepaid wireless service, Q Link is proposing to offer qualified customers a free handset and the choice of three different free prepaid calling plans.¹²

As indicated above, the FCC granted Q Link forbearance from the facilities requirement that it provide service using its own facilities or a combination of its own facilities and resale of another carrier’s service and also any criteria related to facilities build out plans. Q Link would

⁹ See *id.* at ¶¶ 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

¹⁰ See “Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang Wireless, IM Telecom, Q Link Wireless and TAG Mobile”, Public Notice from FCC Wireline Competition Bureau, WC Docket Nos. 09-197 and 11-42 (rel. August 8, 2012).

¹¹ 47 C.F.R. §§ 54.405 and 54.411(a)

¹² See Application, page 4 and response to Staff Data Request STF 1.34. Q Link’s offering of 68, 150 or 250 free monthly minutes to Lifeline customers mirrors the plans offered by TracFone (Decision No. 72222).

be a Lifeline-only ETC, eligible only for Lifeline support and must meet all the other criteria required of ETCs.

A. Offering the Services Designated for Support

On December 23, 2011, the FCC adopted and released an Order on Reconsideration in which the FCC modified, on its own motion, the definition of “voice telephony”, as adopted in the *USF/ICC Transformation Order*.¹³ In that Order, the FCC reduced its former list of nine supported services to four supported services and amended 47 C.F.R. § 54.101 to specify the “voice telephony services” supported by federal universal service support mechanisms.¹⁴

47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to receive Federal universal service fund support. The services and Q Link’s response to the provision of each service are as follows:

- (1) Voice grade access to the Public Switched Network. “Voice grade access to the Public Switched Network” is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and receive voice communications, including receiving a signal indicating there is an incoming call. For purposes of this Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz. Q Link states¹⁵ it provides voice grade access to the public switched telephone network (“PSTN”) through the purchase of wholesale wireless services from Sprint.
- (2) Local usage. “Local usage” means minutes of use for local exchange service, prescribed by the Federal Communications Commission, provided free of charge to end users. Q Link states¹⁶ it will provide Lifeline customers with minutes of use for local service at no additional charge to customers.
- (3) Access to emergency services. “Access to emergency services” includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code “911”, to call emergency services through a Public Safety Access Point (“PSAP”) operated by the local

¹³ See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform-Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (*USF/ICC Transformation Order on Reconsideration*) at ¶ 3.

¹⁴ *Id.* at ¶ 78; see also *id.* App. A at 536 (revising section 54.101(a) of the Commission’s rules); see 76 FR 73830, 73870 (Nov. 29, 2011) (revising 47 C.F.R. § 54.101(a) with an effective date of December 29, 2011).

¹⁵ Application, Page 11 and response to Staff Data Request STF 1.58.

¹⁶ Application, Page 17.

government. “Enhanced 911” is defined as 911 service that includes the ability to provide automatic numbering information (“ANI”), which enables the PSAP to call back if the call is disconnected, and automatic location identification (“ALI”), which permits emergency service providers to identify the geographic location of the calling party. “Access to emergency services” includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier’s service area has implemented 911 or enhanced 911 systems. Q Link states¹⁷ all its customers will have access to emergency calling services at the time Lifeline service is initiated, and such 911 and E911 access will be available from Q Link’s handsets even if the account associated with the handset has no minutes remaining.

- (4) Toll Limitation for Qualifying Low-Income Consumers. “Toll limitation denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications carriers that are capable of providing both services, ‘toll limitation’ denotes toll blocking and toll control.”¹⁸ In the *Lifeline Reform Order* the FCC relieved ETCs of the obligation to offer toll limitation services if their Lifeline offering does not distinguish in the pricing of toll and non-toll calls.¹⁹ Q Link’s wireless calling plans do not distinguish between non-toll (i.e. local) and toll. Q Link’s prepaid plans include a specific number of minutes that cannot be exceeded. Therefore, customers cannot incur any charges for excessive toll calling or be disconnected for non-payment.

In its application, Q Link states it has the ability to provide all the supported services and functionalities required in the proposed ETC designated service area to all subscribers taking service under its Lifeline plan through arrangements with its underlying carrier. Based on the above information and explanations, Staff believes that Q Link meets this ETC designation criteria.

B. Advertising of Supported Services

47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible telecommunications carrier to advertise the availability of such services and the corresponding charges using media of general distribution. Q Link states it will advertise the availability of its supported services and the corresponding rates and charges in a manner designed to inform the general public. Q Link’s advertising will occur through a combination of media channels, such as direct mail, television and radio, in-store and outdoor signage, bus/public transit signage and print advertising and the Internet.²⁰ Advertisements will be both English and Spanish. Q Link submitted examples of its advertisements in its TRCP to the FCC.²¹

¹⁷ Application, Page 5.

¹⁸ 47 C.F.R. § 54.400(d).

¹⁹ *Lifeline Reform Order*, ¶238.

²⁰ Response to Staff Data Request STF 1.39 and 1.41.

²¹ See Exhibit B of the TRCP.

Based on the information above and Q Link's advertising materials provided in its TRCP, Staff concludes that Q Link will advertise the availability of its supported services and the corresponding charges using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B). Staff believes that Q Link meets this ETC designation criteria.

C. Additional ETC Requirements

In addition to the requirements listed above the FCC adopted, in the *Lifeline Reform Order*, comprehensive reforms to the low-income program to revise and modernize the Lifeline service requirements and implement measures to address fraud, waste, and abuse within the system. Below are the additional requirements and Q Link's response to each requirement.

C.1 A Commitment and Ability to Provide Supported Services

In 47 C.F.R. § 54.202(a)(1)(i) and (ii), the FCC required the applicant to:

(i) Certify that it will comply with the service requirements applicable to the support that it receives; and

(ii) Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. Each applicant shall estimate the area and population that will be served as a result of the improvements. Except, a common carrier seeking designation as an eligible telecommunications carrier in order to provide supported services only under subpart E of this part does not need to submit such a five-year plan.²²

Q Link states²³ it will comply with the service requirements applicable to the support that it receives. The requirement directing submissions of a formal network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii) does not apply to Q Link because it is seeking only to provide supported services under subpart E of this part, i.e. Lifeline only, and the FCC waived the facilities-based requirements for Q Link.

Based on the above information, Staff believes that Q Link meets this ETC designation criteria.

C.2 Remain Functional in Emergency Situations

In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant demonstrate its ability to remain functional in emergency situations. Specifically, "an applicant must demonstrate that it has a reasonable amount of back-up power to ensure functionality

²² *Lifeline Reform Order*, ¶ 386.

²³ TRCP, page 21.

without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”²⁴

To demonstrate its ability to remain functional in emergency situations, Q Link states²⁵ it purchases wireless network services on a wholesale basis from Sprint, a large, national carrier that is itself subject to various regulatory requirements to remain functional in emergencies. Through Sprint, Q LINK provides to its customers the same ability to remain functional in emergency situations as currently provided by Sprint to its own customers, including access to a reasonable amount of backup power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Based on the above information, Staff concludes that Q Link has demonstrated its ability to remain functional in emergency situations by maintaining a reasonable amount of back-up power. Staff believes that Q Link meets this ETC designation criteria.

C.3 Satisfy Consumer Protection and Service Quality Standards

In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application...”²⁶ The sufficiency of other commitments will be considered on a case-by-case basis.

To demonstrate its ability to satisfy consumer protection and service quality standards, Q Link commits²⁷ to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Q LINK commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3). Q Link affirms its commitment to satisfy applicable consumer protection and service quality standards if certified as an ETC.²⁸

Based on the above information, Staff believes that Q Link meets this ETC designation criteria.

C.4 Lifeline-Only ETC Applicants – Financial and Technical Capability

In 47 C.F.R. § 54.202(a)(4), the FCC requires a Lifeline-only ETC applicant to demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with subpart E of this part. In the *Lifeline Reform Order*²⁹ the FCC provides

²⁴ *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005) (“*ETC Minimum Requirements Report and Order*”), ¶ 25.

²⁵ Response to Staff Data Request STF 1.59.

²⁶ *ETC Minimum Requirements Report and Order*, ¶ 28.

²⁷ Application, Pages 16-17.

²⁸ TRCP, Page 21.

²⁹ See *Lifeline Reform Order*, ¶388.

guidance on specific information to be considered when determining if an applicant meets this requirement:

“...Among the relevant considerations for such a showing would be whether the applicant previously offered services to non-Lifeline customers, how long its has been in business, whether the applicant intends to rely exclusively on USF distributions to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.”

To demonstrate that Q Link is financially and technically capable of providing Lifeline service, Q Link states³⁰ it is financially and technically capable of providing Lifeline-supported services³¹ and will provide service to both Lifeline and non-Lifeline customers in Arizona. Q Link intends to launch its retail and Lifeline wireless service simultaneously. Q Link states it has not been subject to enforcement action or ETC revocation proceedings in any state. Although Q Link’s initial applications for ETC designation in Kentucky,³² Massachusetts³³ and Texas³⁴ were dismissed without prejudice by the respective State Commissions for not meeting the own-facilities requirement, Q Link has since received approval of its FCC Compliance plan and forbearance of the own-facilities requirement and has refilled applications in each of these states. Q Link states³⁵ it is financially able to provide Lifeline-supported services and will not rely exclusively on USF disbursements to operate. Furthermore, the senior management of Q Link has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to the Company.³⁶ In addition, Q Link will also rely upon the managerial and technical expertise of its underlying carrier Sprint.

Having reviewed Q Link’s financial statements, the technical experience of Q Link’s senior management and based on the above information, Staff believes that Q Link meets this ETC designation criteria.

C.5 Lifeline-Only ETC Applicants – Terms and Conditions of Lifeline Service Plans

In 47 C.F.R. § 54.202(a)(5), the FCC requires an ETC applicant to submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers plans to

³⁰ TRCP, Page 22.

³¹ *See Order* at ¶ 387.

³² Kentucky Public Service Commission, Case No. 2011-00480, Order issued 2/2/2012.

³³ Commonwealth of Massachusetts, Department of Telecommunications and Cable, D.T.C. 11-18, Order of Dismissal Without Prejudice, issued 2/22/2012.

³⁴ Public Utility Commission of Texas, Docket No. 40011, Order No. 6 issued 2/22/2012.

³⁵ TRCP, Page 22.

³⁶ TRCP, Exhibit D for key management resumes.

Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.

Q Link provided Staff with its informational tariff³⁷ in which it describes the calling plans for Lifeline subscribers, including the number of free minutes in each calling plan, along with the terms and conditions of Lifeline service as provided by Q Link. Based on the information contained in Q Link's informational tariff, Staff believes that Q Link meets this ETC designation criteria.

D. Steps to Limit Fraud, Waste and Abuse of the FUSF

In the *Lifeline Reform Order* the FCC adopted various new measures and revised or eliminated other existing measures in order to limit fraud, waste and abuse of the Federal Universal Service Fund ("FUSF"). These measures include establishing uniform eligibility criteria to qualify for Lifeline services, clarifying the restriction of one Lifeline telephone allowed per household, initial certification and annual re-certification of consumer eligibility, establishing a national lifeline accountability database to ensure and enforce the one-per-household requirement, total elimination of toll limitation support for wireless carriers and a tapered elimination of toll limitation support for landline ETCs, elimination of the Link Up subsidy except on federally-recognized tribal lands and establishing additional provisions for USAC audits.

In its TRCP, Q Link outlines the steps it will take to limit fraud, waste and abuse of the FUSF and to comply with all applicable Lifeline requirements and implement measures to prevent fraud, waste, and abuse.

E. Public Interest Determination

Under Section 214 of the Act, the FCC and state commissions must determine that an ETC designation is consistent with the public interest, convenience and necessity for rural areas. They also must consider whether an ETC designation serves the public interest consistent with Section 254 of the Act. Congress did not establish specific criteria to be applied under the public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.³⁸ Accordingly, before designating a carrier as an ETC, the Commission must make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.

³⁷ Response to Staff Data Request STF 1.52.

³⁸ *ETC Minimum Requirements Report and Order*, ¶ 40.

Q Link states that by designating it as a wireless ETC in Arizona, it will serve the public interest and the needs of low-income customers in Arizona by increasing customer choice in the areas it serves. The public interest benefits associated with Q Link's wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and personal security afforded by mobile telephone service, the opportunity for customers to receive a high-value wireless plan and emergency services in accordance with FCC Rules. Additionally, ETC status will promote universal service by allowing Q Link to offer wireless service to many low-income customers who may not be able to otherwise have service. Q Link's Lifeline calling plans are designed to provide service to Lifeline consumers who, due to credit or deposit requirements, may not be able to obtain telephone service from more traditional wireline and wireless service providers.

F. Designated Service Area

The Commission must establish a geographic area for the purpose of determining universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b). Q Link requests that the Commission designate it as an ETC for service areas in Arizona. Through resale of wireless service provided by Sprint in Arizona, Q Link will provide Lifeline service in many zip codes in the State of Arizona, excluding tribal lands.

There are a number of zip codes that encompass both tribal lands and non-tribal lands. Some of the tribal lands are served by tribal-owned telephone companies and some of the tribal lands are served by non-tribally owned telephone companies. For those zip codes that encompass tribal lands, Q Link requested to serve only the non-tribal areas of the zip code. Attachment 1 is a list of each zip code served by Q Link.

G. Reporting Requirement for Prepaid Wireless Deactivations

Staff recommends that Q Link be required to provide a quarterly report to the ACC, to be filed in docket control as a Compliance item, summarizing the total number of customers with periods of inactivity greater than 60 days, but did not cancel service with Q Link, are no longer qualified for Lifeline service or who voluntarily deactivate service during that quarter. The purpose of this report is to monitor the number of deactivated customers so that Q Link does not continue to receive Lifeline reimbursement per handset for these customers every month from the Universal Service Administrative Company ("USAC"). In compiling the data for these reports, Q Link must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the deenrollment policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute usage. The quarterly report must also include the total number of Lifeline customers and, as separate items, the number of customers who voluntarily relinquish their Q Link provided Lifeline service, the number of customers who do not annually recertify their eligibility for Lifeline services and the number of customers deactivated for 60 days of inactivity.

4. INTERVENOR

A. ARIZONA LOCAL EXCHANGE CARRIERS ASSOCIATION

The Arizona Local Exchange Carriers Association (“ALECA”) is an association of telephone companies and member-owned cooperatives providing local exchange telecommunications services to customers in rural, high cost areas of Arizona. All of ALECA’s members are “rural telephone companies” as defined by the Communications Act of 1934, as amended (the “Act”) 47 U.S.C. § 153(37). In its Motion to Intervene, ALECA states, “Each ALECA member, including its Tribally-owned members, receives support from the Federal Universal Service Fund (“FUSF”) in the form of High Cost Support. Each member also provides discounted Lifeline telephone service and receives compensation for the discounts from the FUSF.” ALECA states it is concerned that Q Link’s offering may unfairly duplicate the similar offerings of its member companies, cause the FUSF requirements to grow to the point where its member companies’ FUSF compensation is endangered, and undermine public support for the FCC’s universal service programs.

B. JOINT STIPULATION

On November 8, 2012, ALECA and Q Link filed a Stipulation in the docket. In the Stipulation, to address the potential concerns expressed by ALECA, Q Link agreed not to provide Lifeline service to eligible residents residing on Federally-recognized Tribal Lands. In addition, Q Link agreed that its Lifeline enrollment application for Arizona will require an applicant to provide a street address and include a provision that requires an applicant to self-certify under penalty of perjury that they do not reside on Federally-recognized Tribal Lands.

5. LINK UP

In its application, Q Link requested Link Up support. Federal Link Up Assistance pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional, wireline telephone or activation fee for a wireless telephone for a primary residence. It also allows participants to pay any remaining amount owed on a deferred schedule, interest-free.

In the Lifeline Reform Order, the FCC eliminated the Link Up program, effective April 1, 2012, with the exception of high cost ETCs serving Tribal lands.³⁹ In its Amendment to its Application, Q Link withdrew its request for Link Up support.⁴⁰ Given the FCC’s elimination of the Link Up program on non-tribal lands and Q Link’s withdrawal of its request for Link Up support, the Link Up support issue is moot and no longer needs to be addressed by this Commission.

³⁹ See Lifeline Reform Order, ¶245 and footnote 652.

⁴⁰ Amendment to Application, Page 1.

6. STAFF RECOMMENDATIONS

In addition to the conditions set forth by the FCC, Staff recommends Q Link's Application for designation as an ETC be granted subject to the following conditions:

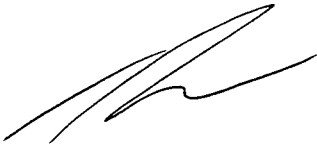
- a. Q Link shall file a tariff, in this docket, setting forth the rates, terms and conditions for its Lifeline service within thirty (30) days of a Commission Order in this matter;
- b. Q Link shall notify the Commission of any future changes to its rates, terms and/or conditions regarding its Lifeline offerings and file such changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;
- c. Q Link shall make available Lifeline services to qualifying low-income applicants in its ETC service area no later than ninety (90) days after a Commission decision in this matter and shall concurrently notify the Commission, by making a filing in Docket Control, in this docket, of the commencement date for such services;
- d. Q Link shall apprise the Commission of any customer complaints that may arise from its ETC service offerings by making a filing in Docket Control in this docket;
- e. Q Link shall provide a regulatory contact to the Commission by making a filing in Docket Control in this docket;
- f. In the event that Q Link requests to relinquish its ETC status and no longer provide Lifeline services, it must provide notice to both the Commission and its customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
- g. Q Link shall submit in Docket Control an annual report by April 15th of each year, beginning April 15, 2014, that contains its total number of Lifeline subscribers, total amount of Federal USF support received and an affidavit stating that the Lifeline discounts or the equivalent are equal to the amount of total Federal USF support per line. The annual filing shall be submitted as a compliance item in this docket;
- h. Q Link shall submit in Docket Control, as a compliance item in this docket, a quarterly report detailing the total number of Lifeline customers, the total number of customers removed from the customer base due to 60-day inactivity, the number of customers removed from the customer base due to annual verification and the total number of customers who voluntarily relinquished Lifeline service. In compiling the data for these reports, Q Link must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the deenrollment policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute usage. The quarterly report should be submitted as a compliance item in this docket on the 15th of the month following the end of each calendar quarter, beginning July 15, 2013, or with the first complete quarter following the offering of prepaid Lifeline calling plans, whichever is earlier;

THE COMMISSION

January 15, 2013

Page 13

- i. In the event of a transfer of control that involves Q Link, a new ETC petition shall be filed with the Commission. This will ensure ETCs undergoing reorganization remain financially viable and able to provide the supported services throughout the designated service areas as originally approved by the Commission; and
- j. Q Link shall not expand its Lifeline service beyond the designated service area specified in this application without acquiring ETC designation from the Commission to serve the additional area.



Steven M. Olea
Director
Utilities Division

SMO·LLM:sms\MAS

ORIGINATOR: Lori Morrison

ATTACHMENT 1
Docket No. T-20824A-11-0446

			Q LINK WIRELESS, LLC				
			Coverage Area by Zip Code				
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85001	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85002	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85003	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85004	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85005	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85006	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85007	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85008	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85009	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85010	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85011	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85012	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85013	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85014	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85015	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85016	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85017	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85018	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85019	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85020	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85021	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85022	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85023	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85024	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85025	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85026	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85027	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85028	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85029	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85030	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85031	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85032	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85033	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85034	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85035	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85036	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85037	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85038	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85040	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85041	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

ATTACHMENT 1
Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC				
		Coverage Area by Zip Code				
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85042	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85043	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85044	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85045	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85046	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85048	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85050	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85051	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85053	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85054	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85055	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85060	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85061	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85062	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85063	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85064	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85065	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85066	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85067	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85068	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85069	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85070	Laveen	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85071	Phoenix	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85072	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85074	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85075	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85076	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85078	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85079	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85080	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85082	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85083	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85085	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85086	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85087	New River	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85096	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85097	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85098	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85099	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85117	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

ATTACHMENT 1
Docket No. T-20824A-11-0446

			Q LINK WIRELESS, LLC			
			Coverage Area by Zip Code			
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85118	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85119	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85120	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85121	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85122	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85123	Arizona City	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85127	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85128	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85130	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85131	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85132	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85138	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85139	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85140	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85141	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85142	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85143	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85145	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85172	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85178	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85190	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85191	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85193	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85194	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85201	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85202	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85203	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85204	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85205	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85206	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85207	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85208	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85209	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85210	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85211	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85212	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85213	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85214	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85215	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85216	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

ATTACHMENT 1
Docket No. T-20824A-11-0446

Q LINK WIRELESS, LLC					Coverage Area by Zip Code		
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85217	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85218	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85219	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85220	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85221	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85222	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority	
85223	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85224	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85225	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85226	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.	
85227	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85228	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85230	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority	
85231	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85232	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85233	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85234	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85236	Higley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85238	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85239	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85240	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85241	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85242	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85243	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85244	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85245	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85246	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85247	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85248	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85249	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.	
85250	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85251	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85252	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85253	Paradise Valley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85254	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85255	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85257	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85258	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85259	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85260	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

ATTACHMENT 1
Docket No. T-20824A-11-0446

Q LINK WIRELESS, LLC				Coverage Area by Zip Code		Tribal Lands Covered
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	
85261	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85263	Rio Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85266	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85267	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85268	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85269	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85271	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85272	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85274	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85275	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85277	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85278	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85280	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85281	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85282	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85283	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85284	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85285	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85286	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85287	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85291	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85293	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85294	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85295	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85296	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85297	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85298	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85299	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85301	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85302	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85303	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85304	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85305	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85306	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85307	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85308	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85309	Luke AFB	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85310	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85311	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85312	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

ATTACHMENT 1
Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85318	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85322	Arlington	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85323	Avondale	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85326	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85327	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85328	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85329	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85331	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85333	Dateland	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85334	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85335	El Mirage	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85336	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85337	Gila Bend	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85338	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85339	Laveen	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.	
85340	Litchfield Park	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85342	Morristown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85343	Palo Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85345	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85346	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85349	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85350	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85351	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85352	Wellton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85353	Tolleson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85354	Tonopah	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85355	Waddell	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85358	Wickenburg	AZ	Phoenix_AZ	PHXWCB928	WICKENBURG, AZ 928		
85359	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85360	Lake Havasu City	AZ	LakeHavasuCity_AZ	NMXMLHC520	LAKE HAVASU CITY, NV 520		
85361	Wittmann	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85363	Youngtown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85364	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85365	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85366	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85367	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85369	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85372	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85373	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85374	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

ATTACHMENT 1
Docket No. T-20824A-11-0446

Q LINK WIRELESS, LLC						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85375	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85376	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85377	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85378	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85379	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85380	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85381	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85382	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85383	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85385	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85387	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85388	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85392	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85395	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85396	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85502	Globe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85532	Miami	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85547	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85553	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85603	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85605	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85606	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85608	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85609	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85613	Fort Huachuca	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85614	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85616	Huachuca City	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85617	MC Neal	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85618	Mammoth	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85619	Mount Lemmon	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85620	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85622	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85623	Oracle	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85626	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85627	Benson	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85628	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85629	Sahuarita	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85630	Saint David	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85631	San Manuel	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85632	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	

ATTACHMENT 1
Docket No. T-20824A-11-0446

			Q LINK WIRELESS, LLC						
			Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc				Tribal Lands Covered
85635	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520				
85636	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520				
85640	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85641	Vail	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85644	Willcox	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520				
85645	Amado	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85646	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85648	Rio Rico	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520				
85650	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520				
85652	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85653	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85654	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85655	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520				
85658	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85662	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520				
85670	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520				
85701	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85702	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85703	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85704	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85705	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85706	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85707	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85708	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85709	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85710	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85711	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85712	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85713	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85714	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85715	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85716	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85717	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85718	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85719	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85721	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85722	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85723	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85724	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				
85725	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520				

ATTACHMENT 1
Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85726	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85728	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85730	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85731	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85732	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85733	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85734	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85735	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85737	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85738	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85739	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85740	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85741	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85742	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85743	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85744	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85745	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85746	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85747	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85748	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85749	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85750	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85751	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85752	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85754	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85755	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85756	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85757	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85942	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86002	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86003	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86004	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86011	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86015	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86017	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86018	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86023	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86025	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86028	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86029	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		

ATTACHMENT 1
Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC				
		Coverage Area by Zip Code				
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
86032	Winslow	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86301	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86302	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86304	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86312	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86313	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86314	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86315	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86320	Ash Fork	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86322	Camp Verde	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86325	Cornville	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86326	Cottonwood	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86327	Dewey	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86329	Dewey	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86330	Prescott	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86331	Clarkdale	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86333	Mayer	AZ	Flagstaff_AZ	NMXPRES20	PRESCOTT, AZ 520	
86335	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86339	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86340	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86341	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86342	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86351	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86402	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86403	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86404	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86405	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86409	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86412	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86413	Golden Valley	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86426	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86427	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86429	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86430	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86431	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86436	Topock	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86438	Bullhead City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86439	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86440	Mohave Valley	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86446	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	

ATTACHMENT 1
Docket No. T-20824A-11-0446

Q LINK WIRELESS, LLC									
Coverage Area by Zip Code									
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered			
86506	Ganado	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.			
86512	Chambers	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.			
86555	Douglas	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520				

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 BOB STUMP

Chairman

3 GARY PIERCE

Commissioner

4 BRENDA BURNS

Commissioner

5 BOB BURNS

Commissioner

6 SUSAN BITTER SMITH

Commissioner

7
8 IN THE MATTER OF THE APPLICATION
9 OF Q LINK WIRELESS LLC FOR
10 APPROVAL OF A CERTIFICATE OF
11 CONVENIENCE AND NECESSITY FOR
12 DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN
THE STATE OF ARIZONA ON A
WIRELESS BASIS (LOW INCOME ONLY).

DOCKET NO. T-20824A-11-0446

DECISION NO. _____

ORDER

13
14 Open Meeting
15 January 30 and 31, 2013
Phoenix, Arizona

16 BY THE COMMISSION:

17 FINDINGS OF FACT

18 1. On December 13, 2011, Q Link Wireless LLC ("Q Link") filed an Application
19 requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to section
20 214(e)(2) of the Communications Act of 1934 (the "Act") and the rules of the Federal
21 Communications Commission ("FCC"), including 47 C.F.R. §§ 54.201 through 54.207. In its
22 Application, Q Link requests that the Arizona Corporation Commission ("ACC" or
23 "Commission") designate it as a wireless ETC for the purpose of receiving federal Universal
24 Service Fund ("FUSF") support for low-income customers only (i.e., Lifeline¹). Q Link is not
25 requesting high cost support.

26 ...
27 _____

28 ¹ Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. The federal support amount provided to an ETC is \$9.25.

1 2. On February 9, 2012, Q Link filed an amendment to its application to withdraw its
2 request for Link Up reimbursement.

3 3. On February 10, 2012, Q Link submitted its initial Compliance Plan to the FCC in
4 order to benefit from the "blanket forbearance" of the own-facilities requirement used to provide
5 Lifeline services.

6 4. On March 9, 2012, the Arizona Local Exchange Carriers Association ("ALECA")
7 filed a motion to intervene.

8 5. On March 30, 2012, a Procedural Order granted ALECA's request for intervention
9 in this proceeding.

10 6. On August 8, 2012, the FCC approved Q Link's Third Revised Compliance Plan
11 ("TRCP") and waived the company owned-facilities requirement. On August 10, 2012, Q Link
12 filed a copy of the TRCP in the docket.

13 7. On November 8, 2012, a Stipulation between ALECA and Q Link was filed in the
14 docket.

15 **BACKGROUND**

16 8. Q Link is a Delaware Limited Liability Company organized on August 25, 2011. Its
17 principal office is located at 499 Sheridan Street, Suite 300, Dania, Florida 33004. Q Link
18 provides Commercial Mobile Radio Service ("CMRS") through the resale of service of other
19 wireless carriers. Q Link currently serves just under 5,000 customers² in the states in which it
20 operates, of which 90% are Lifeline customers, Q Link has been granted wireless ETC designation
21 in nine (9) jurisdictions³ with seventeen (17) applications pending in other jurisdictions.⁴ Q Link
22 states⁵ it will provide wireless service through a "virtual network" provider, Boomerang Wireless,
23 LLC dba Ready Mobile ("Ready Mobile"), consisting of services obtained from licensed wireless
24

25 ² Response to Staff Data Request STF 2.1.

26 ³ Colorado, Maryland, Michigan, Missouri, Nevada, Oklahoma, Texas, West Virginia and Wisconsin.

27 ⁴ Arkansas, California, Georgia, Illinois, Kansas, Kentucky, Louisiana, Maine, Massachusetts, Minnesota, Mississippi,
28 New Jersey, Ohio, Pennsylvania, South Carolina, Utah, and Federal ETC designation for Alabama, Connecticut,
Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia and the
District of Columbia.

⁵ Response to Staff Data Request STF 1.15.

1 network operator Sprint PCS ("Sprint") and does not own or operate any of its own wireless
2 facilities. Q Link's arrangement through Ready Mobile and its underlying wireless carrier Sprint
3 enables it to offer services wherever the underlying wireless carriers offer service in the State of
4 Arizona. Both non-rural and rural incumbent local exchange carriers ("ILECs") provide wireline
5 service within these areas. For its proposed designated service area, Q Link provided a list of zip
6 codes in which it will provide service and identified the ILEC(s) serving each zip code in its
7 proposed tariff⁶ (See Attachment 1).

8 9. On February 6, 2012, the FCC released an Order in FCC 12-11, *Lifeline and Link*
9 *Up Reform and Modernization ("Lifeline Reform Order")*⁷, in which the FCC adopted
10 comprehensive reforms to the low-income program to revise and modernize the Lifeline service
11 requirements and implement measures to address fraud, waste and abuse of the FUSF. Within that
12 Order, the FCC found that a grant of blanket forbearance of the requirement that an ETC use its
13 own facilities ("the facilities requirement") subject to certain public safety and compliance
14 obligations, was appropriate for carriers seeking to provide Lifeline-only service.⁸ Specifically, in
15 the *Lifeline Reform Order*, the FCC states it will conditionally grant forbearance from the Act's
16 Section 214(e)(1)(A) facilities requirement to all telecommunications carriers seeking Lifeline-
17 only ETC designation, subject to the following conditions: (1) compliance with certain 911 and
18 enhanced 911 (E911) public safety requirements; and (2) FCC Wireline Competition Bureau
19 approval of a compliance plan providing specific information regarding the carrier and its service
20 offerings and outlining the measures the carrier will take to implement the obligations contained in
21 the *Order*.⁹

22 10. On February 10, 2012, Q Link submitted its initial Compliance Plan to the FCC in
23 order to benefit from the "blanket forbearance" of the own-facilities requirement used to provide
24

25 ⁶ Response to Staff Data Request STF 1.52.

26 ⁷ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 ("*Lifeline Reform Order*").

27 ⁸ *Ibid.*, at ¶¶ 368-381.

28 ⁹ See *id.* at ¶¶ 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Red 2186 (Wireline Comp. Bur. 2012).

1 Lifeline services. Q Link submitted its TRCP on June 30, 2012, making changes as the result of
2 discussions with FCC Staff. On August 8, 2012, in DA 12-1286, the FCC issued a Public Notice¹⁰
3 approving Q Link's June 30, 2012 TRCP.

4 **REQUIREMENTS FOR DESIGNATION AS AN ETC AND Q LINK'S COMPLIANCE**
5 **WITH THE REQUIREMENTS**

6 11. Designation as an ETC makes a carrier eligible to receive federal universal service
7 funds. The requirements for designation of ETCs are specified by federal law in 47 U.S.C. §
8 214(e)(1), which states:

9 "A common carrier designated as an eligible telecommunications carrier under paragraph
10 (2) or (3) shall be eligible to receive universal service support in accordance with section
11 254 and shall throughout the service area for which the designation is received: (A) offer
12 the services that are supported by Federal universal service support mechanisms under
13 section 254(c), either using its own facilities or a combination of its own facilities and
14 resale of another carrier's services (including the services offered by another eligible
15 telecommunications carrier); and (B) advertise the availability of such services and the
16 corresponding charges using media of general distribution."

17 12. In order to be designated as an ETC, a carrier must offer Lifeline service to all
18 qualifying low-income customers within its service area.¹¹ Lifeline service provides basic
19 telephone service, typically by passing on discounts to monthly telecommunications charges. As a
20 wireless reseller of prepaid wireless service, Q Link is proposing to offer qualified customers a
21 free handset and the choice of three different free prepaid calling plans.¹²

22 13. As indicated above, the FCC granted Q Link forbearance from the facilities
23 requirement that it provide service using its own facilities or a combination of its own facilities and
24 resale of another carrier's service and also any criteria related to facilities build out plans. Q Link
25 would be a Lifeline-only ETC, eligible only for Lifeline support and must meet all the other
26 criteria required of ETCs.

27 ...

28 ¹⁰ See "Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang
Wireless, IM Telecom, Q Link Wireless and TAG Mobile", Public Notice from FCC Wireline Competition Bureau,
WC Docket Nos. 09-197 and 11-42 (rel. August 8, 2012).

¹¹ 47 C.F.R. §§ 54.405 and 54.411(a)

¹² See Application, page 4 and response to Staff Data Request STF 1.34. Q Link's offering of 68, 150 or 250 free
monthly minutes to Lifeline customers mirrors the plans offered by TracFone (Decision No. 72222).

1 **A. OFFERING THE SERVICES DESIGNATED FOR SUPPORT**

2 14. On December 23, 2011, the FCC adopted and released an Order on Reconsideration
3 in which the FCC modified, on its own motion, the definition of “voice telephony”, as adopted in
4 the *USF/ICC Transformation Order*.¹³ In that Order, the FCC reduced its former list of nine
5 supported services to four supported services and amended 47 C.F.R. § 54.101 to specify the
6 “voice telephony services” supported by federal universal service support mechanisms.¹⁴

7 15. 47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to
8 receive Federal universal service fund support. The services and Q Link’s response to the
9 provision of each service are as follows:

10 (a) Voice grade access to the Public Switched Network. “Voice grade access to the
11 Public Switched Network” is defined as a functionality that enables a user of
12 telecommunications services to transmit voice communications, including signaling the
13 network that the caller wishes to place a call, and receive voice communications,
14 including receiving a signal indicating there is an incoming call. For purposes of this
Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.
Q Link states¹⁵ it provides voice grade access to the public switched telephone network
15 (“PSTN”) through the purchase of wholesale wireless services from Sprint.

16 (b) Local usage. “Local usage” means minutes of use for local exchange service,
17 prescribed by the Federal Communications Commission, provided free of charge to end
users. Q Link states¹⁶ it will provide Lifeline customers with minutes of use for local
service at no additional charge to customers.

18 (c) Access to emergency services. “Access to emergency services” includes access to
19 services, such as 911 and enhanced 911, provided by local governments or other public
20 safety organizations. 911 is defined as a service that permits a telecommunications
21 user, by dialing the three-digit code “911”, to call emergency services through a Public
22 Safety Access Point (“PSAP”) operated by the local government. “Enhanced 911” is
23 defined as 911 service that includes the ability to provide automatic numbering
information (“ANI”), which enables the PSAP to call back if the call is disconnected,
and automatic location identification (“ALI”), which permits emergency service

24 ¹³ See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and*
25 *Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified*
26 *Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal*
Service Reform-Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket
No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on
Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (*USF/ICC Transformation Order on Reconsideration*) at ¶ 3.

27 ¹⁴ *Id.* at ¶ 78; see also *id.* App. A at 536 (revising section 54.101(a) of the Commission’s rules); see 76 FR 73830,
73870 (Nov. 29, 2011) (revising 47 C.F.R. § 54.101(a) with an effective date of December 29, 2011).

28 ¹⁵ Application, Page 11 and response to Staff Data Request STF 1.58.

¹⁶ Application, Page 17.

1 providers to identify the geographic location of the calling party. "Access to emergency
2 services" includes access to 911 and enhanced 911 services to the extent the local
3 government in an eligible carrier's service area has implemented 911 or enhanced 911
4 systems. Q Link states¹⁷ all its customers will have access to emergency calling
5 services at the time Lifeline service is initiated, and such 911 and E911 access will be
6 available from Q Link's handsets even if the account associated with the handset has no
7 minutes remaining.

8 (d) Toll Limitation for Qualifying Low-Income Consumers. "Toll limitation denotes
9 either toll blocking or toll control for eligible telecommunications carriers that are
10 incapable of providing both services. For eligible telecommunications carriers that are
11 capable of providing both services, 'toll limitation' denotes toll blocking and toll
12 control."¹⁸ In the *Lifeline Reform Order* the FCC relieved ETCs of the obligation to
13 offer toll limitation services if their Lifeline offering does not distinguish in the pricing
14 of toll and non-toll calls.¹⁹ Q Link's wireless calling plans do not distinguish between
15 non-toll (i.e., local) and toll. Q Link's prepaid plans include a specific number of
16 minutes that cannot be exceeded. Therefore, customers cannot incur any charges for
17 excessive toll calling or be disconnected for non-payment.

18 16. In its application, Q Link states it has the ability to provide all the supported
19 services and functionalities required in the proposed ETC designated service area to all subscribers
20 taking service under its Lifeline plan through arrangements with its underlying carrier. Based on
21 the above information and explanations, Staff believes that Q Link meets this ETC designation
22 criteria.

23 B. ADVERTISING OF SUPPORTED SERVICES

24 17. 47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible
25 telecommunications carrier to advertise the availability of such services and the corresponding
26 charges using media of general distribution. Q Link states it will advertise the availability of its
27 supported services and the corresponding rates and charges in a manner designed to inform the
28 general public. Q Link's advertising will occur through a combination of media channels, such as
direct mail, television and radio, in-store and outdoor signage, bus/public transit signage and print

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...

¹⁷ Application, Page 5.

¹⁸ 47 C.F.R. § 54.400(d).

¹⁹ *Lifeline Reform Order*, ¶238.

1 advertising and the Internet.²⁰ Advertisements will be both English and Spanish. Q Link
2 submitted examples of its advertisements in its TRCP to the FCC.²¹

3 18. Based on the information above and Q Link's advertising materials provided to
4 Staff, Staff concludes that Q Link will advertise the availability of its supported services and the
5 corresponding charges using media of general distribution as required by 47 U.S.C. §
6 214(e)(1)(B). Staff believes that Q Link meets this ETC designation criteria.

7 **C. ADDITIONAL ETC REQUIREMENTS**

8 19. In addition to the requirements listed above, the FCC adopted, in the Lifeline
9 Reform Order, comprehensive reforms to the low-income program to revise and modernize the
10 Lifeline service requirements and implement measures to address fraud, waste, and abuse within
11 the system. Below are the additional requirements and Q Link's response to each requirement.

12 **C.1 A Commitment and Ability to Provide Supported Services**

13 20. In 47 C.F.R. § 54.202(a)(1)(i) and (ii), the FCC required the applicant to:

14 (i) Certify that it will comply with the service requirements applicable to the
15 support that it receives; and

16 (ii) Submit a five-year plan that describes with specificity proposed improvements
17 or upgrades to the applicant's network throughout its proposed service area. Each
18 applicant shall estimate the area and population that will be served as a result of the
19 improvements. Except, a common carrier seeking designation as an eligible
20 telecommunications carrier in order to provide supported services only under
21 subpart E of this part does not need to submit such a five-year plan.²²

22 21. Q Link states²³ it will comply with the service requirements applicable to the
23 support that it receives. The requirement directing submissions of a formal network improvement
24 plan under 47 C.F.R. § 54.202(a)(1)(ii) does not apply to Q Link because it is seeking only to

25 ...

26 ²⁰ Response to Staff Data Request STF 1.39 and 1.41.

27 ²¹ See Exhibit B of the TRCP.

28 ²² *Lifeline Reform Order*, ¶ 386.

²³ TRCP, page 21.

1 provide supported services under subpart E of this part, i.e. Lifeline only, and the FCC waived the
2 facilities-based requirements for Q Link.

3 22. Based on the above information, Staff believes that Q Link meets this ETC
4 designation criteria.

5 C.2 Remain Functional in Emergency Situations

6 23. In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant
7 demonstrate its ability to remain functional in emergency situations. Specifically, “an applicant
8 must demonstrate that it has a reasonable amount of back-up power to ensure functionality without
9 an external power source, is able to reroute traffic around damaged facilities, and is capable of
10 managing traffic spikes resulting from emergency situations.”²⁴

11 24. To demonstrate its ability to remain functional in emergency situations, Q Link
12 states²⁵ it purchases wireless network services on a wholesale basis from Sprint, a large, national
13 carrier that is itself subject to various regulatory requirements to remain functional in emergencies.
14 Through Sprint, Q LINK provides to its customers the same ability to remain functional in
15 emergency situations as currently provided by Sprint to its own customers, including access to a
16 reasonable amount of backup power to ensure functionality without an external power source, the
17 ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes
18 resulting from emergency situations.

19 25. Based on the above information, Staff concludes that Q Link has demonstrated its
20 ability to remain functional in emergency situations by maintaining a reasonable amount of back-
21 up power. Staff believes that Q Link meets this ETC designation criteria.

22 ...

23 ...

24 ...

25 ...

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27 ²⁴ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. March
28 17, 2005) (“ETC Minimum Requirements Report and Order”), ¶ 25.

²⁵ Response to Staff Data Request STF 1.59.

C.3 Satisfy Consumer Protection and Service Quality Standards

26. In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application...²⁶

The sufficiency of other commitments will be considered on a case-by-case basis.

27. To demonstrate its ability to satisfy consumer protection and service quality standards, Q Link commits²⁷ to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Q LINK commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3). Q Link affirms its commitment to satisfy applicable consumer protection and service quality standards if certified as an ETC.²⁸

28. Based on the above information, Staff believes that Q Link meets this ETC designation criteria.

C.4 Lifeline-Only ETC Applicants – Financial and Technical Capability

29. In 47 C.F.R. § 54.202(a)(4), the FCC requires a Lifeline-only ETC applicant to demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with subpart E of this part. In the *Lifeline Reform Order*²⁹ the FCC provides guidance on specific information to be considered when determining if an applicant meets this requirement:

“...Among the relevant considerations for such a showing would be whether the applicant previously offered services to non-Lifeline customers, how long its has been in business, whether the applicant intends to rely exclusively on USF distributions to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.”

30. To demonstrate that Q Link is financially and technically capable of providing Lifeline service, Q Link states³⁰ is financially and technically capable of providing Lifeline-

²⁶ ETC Minimum Requirements Report and Order, ¶ 28.

²⁷ Application, Pages 16-17.

²⁸ TRCP, Page 21.

²⁹ See *Lifeline Reform Order*, ¶388.

³⁰ TRCP, Page 22.

1 supported services ³¹ and will provide service to both Lifeline and non-Lifeline customers in
2 Arizona. Q Link intends to launch its retail and Lifeline wireless service simultaneously. Q Link
3 states it has not been subject to enforcement action or ETC revocation proceedings in any state.
4 Although Q Link's initial applications for ETC designation in Kentucky,³² Massachusetts³³ and
5 Texas³⁴ were dismissed without prejudice by the respective State Commissions for not meeting the
6 own-facilities requirement, Q Link has since received approval of its FCC Compliance plan and
7 forbearance of the own-facilities requirement and has refilled applications in each of these states.
8 Q Link states³⁵ it is financially able to provide Lifeline-supported services and will not rely
9 exclusively on USF disbursements to operate. Furthermore, the senior management of Q Link has
10 great depth in the telecommunications industry and offers extensive telecommunications business
11 technical and managerial expertise to the Company.³⁶ In addition, Q Link will also rely upon the
12 managerial and technical expertise of its underlying carrier Sprint.

13 31. Having reviewed Q Link's financial statements, the technical experience of Q
14 Link's senior management and based on the above information, Staff believes that Q Link meets
15 this ETC designation criteria.

16 **C.5 Lifeline-Only ETC Applicants – Terms and Conditions of Lifeline**
17 **Service Plans**

18 32. In 47 C.F.R. § 54.202(a)(5), the FCC requires an ETC applicant to submit
19 information describing the terms and conditions of any voice telephony service plans offered to
20 Lifeline subscribers, including details on the number of minutes provided as part of the plan,
21 additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers
22 plans to Lifeline subscribers that are generally available to the public, it may provide summary
23

24
25 ³¹ See Order at ¶ 387.

26 ³² Kentucky Public Service Commission, Case No. 2011-00480, Order issued 2/2/2012.

27 ³³ Commonwealth of Massachusetts, Department of Telecommunications and Cable, D.T.C. 11-18, Order of Dismissal
Without Prejudice, issued 2/22/2012.

28 ³⁴ Public Utility Commission of Texas, Docket No. 40011, Order No. 6 issued 2/22/2012.

³⁵ TRCP, Page 22.

³⁶ TRCP, Exhibit D for key management resumes.

1 information regarding such plans, such as a link to a public Web site outlining the terms and
2 conditions of such plans.

3 33. Q Link provided Staff with its informational tariff³⁷ in which it describes the calling
4 plans for Lifeline subscribers, including the number of free minutes in each calling plan, along
5 with the terms and conditions of Lifeline service as provided by Q Link. Based on the information
6 contained in Q Link's informational tariff, Staff believes that Q Link meets this ETC designation
7 criteria.

8 **D. STEPS TO LIMIT FRAUD, WASTE AND ABUSE OF THE FUSF**

9 34. In the *Lifeline Reform Order* the FCC adopted various new measures and revised or
10 eliminated other existing measures in order to limit fraud, waste and abuse of the Federal
11 Universal Service Fund ("FUSF"). These measures include establishing uniform eligibility criteria
12 to qualify for Lifeline services, clarifying the restriction of one Lifeline telephone allowed per
13 household, initial certification and annual re-certification of consumer eligibility, establishing a
14 national lifeline accountability database to ensure and enforce the one-per-household requirement,
15 total elimination of toll limitation support for wireless carriers and a tapered elimination of toll
16 limitation support for landline ETCs, elimination of the Link Up subsidy except on federally-
17 recognized tribal lands and establishing additional provisions for USAC audits.

18 35. In its TRCP, Q Link outlines the steps it will take to limit fraud, waste and abuse of
19 the FUSF and to comply with all applicable Lifeline requirements and implement measures to
20 prevent fraud, waste, and abuse.

21 **E. PUBLIC INTEREST DETERMINATION**

22 36. Under Section 214 of the Act, the FCC and state commissions must determine that
23 an ETC designation is consistent with the public interest, convenience and necessity for rural
24 areas. They also must consider whether an ETC designation serves the public interest consistent
25 with Section 254 of the Act. Congress did not establish specific criteria to be applied under the
26 public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC
27

28 ³⁷ Response to Staff Data Request STF 1.52.

1 designation must be analyzed in a manner that is consistent with the purposes of the Act itself,
2 including the fundamental goals of preserving and advancing universal service; ensuring the
3 availability of quality telecommunications services at just, reasonable, and affordable rates; and
4 promoting the deployment of advanced telecommunications and information services to all regions
5 of the nation, including rural and high-cost areas.³⁸ Accordingly, before designating a carrier as an
6 ETC, the Commission must make an affirmative determination that such designation is in the
7 public interest, regardless of whether the applicant seeks designation in an area served by a rural or
8 non-rural carrier.

9 37. Q Link states that by designating it as a wireless ETC in Arizona, it will serve the
10 public interest and the needs of low-income customers in Arizona by increasing customer choice in
11 the areas it serves. The public interest benefits associated with Q Link's wireless service include
12 larger local calling areas (as compared to traditional wireline carriers), the convenience and
13 personal security afforded by mobile telephone service, the opportunity for customers to receive a
14 high-value wireless plan and emergency services in accordance with FCC Rules. Additionally,
15 ETC status will promote universal service by allowing Q Link to offer wireless service to many
16 low-income customers who may not be able to otherwise have service. Q Link's Lifeline calling
17 plans are designed to provide service to Lifeline consumers who, due to credit or deposit
18 requirements, may not be able to obtain telephone service from more traditional wireline and
19 wireless service.

20 **F. DESIGNATED SERVICE AREA**

21 38. The Commission must establish a geographic area for the purpose of determining
22 universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. §
23 214(e)(2); 47 C.F.R. § 54.201(b). Q Link requests that the Commission designate it as an ETC for
24 service areas in Arizona. Through resale of wireless service provided by Sprint in Arizona, Q Link
25 will provide Lifeline service in many zip codes in the State of Arizona, excluding tribal lands.

26 ...

27

28 ³⁸ *ETC Minimum Requirements Report and Order*, ¶ 40.

1 39. There are a number of zip codes that encompass both tribal lands and non-tribal
2 lands. Some of the tribal lands are served by tribal-owned telephone companies and some of the
3 tribal lands are served by non-tribally owned telephone companies. For those zip codes that
4 encompass tribal lands, Q Link requested to serve only the non-tribal areas of the zip code.
5 Attachment 1 is a list of each zip code served by Q Link.

6 **G. REPORTING REQUIREMENT FOR PREPAID WIRELESS**
7 **DEACTIVATIONS**

8 40. Staff recommends that Q Link be required to provide a quarterly report to the ACC,
9 to be filed in docket control as a Compliance item, summarizing the total number of customers
10 with periods of inactivity greater than 60 days, but did not cancel service with Q Link, are no
11 longer qualified for Lifeline service or who voluntarily deactivate service during that quarter. The
12 purpose of this report is to monitor the number of deactivated customers so that Q Link does not
13 continue to receive Lifeline reimbursement per handset for these customers every month from the
14 Universal Service Administrative Company ("USAC"). In compiling the data for these reports, Q
15 Link must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the deenrollment
16 policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute
17 usage. The quarterly report must also include the total number of Lifeline customers and, as
18 separate items, the number of customers who voluntarily relinquish their Q Link provided Lifeline
19 service, the number of customers who do not annually recertify their eligibility for Lifeline
20 services and the number of customers deactivated for 60 days of inactivity.

21 **INTERVENOR**

22 **1. Arizona Local Exchange Carriers Association**

23 41. The Arizona Local Exchange Carriers Association is an association of telephone
24 companies and member-owned cooperatives providing local exchange telecommunications
25 services to customers in rural, high cost areas of Arizona. All of ALECA's members are "rural
26 telephone companies" as defined by the Communications Act of 1934, as amended (the "Act") 47
27 U.S.C. § 153(37). In its Motion to Intervene, ALECA states, "Each ALECA member, including its
28 Tribally-owned members, receives support from the Federal Universal Service Fund ("FUSF") in

1 the form of High Cost Support. Each member also provides discounted Lifeline telephone service
2 and receives compensation for the discounts from the FUSF.” ALECA states it is concerned that
3 Q Link’s offering may unfairly duplicate the similar offerings of its member companies, cause the
4 FUSF requirements to grow to the point where its member companies’ FUSF compensation is
5 endangered, and undermine public support for the FCC’s universal service programs.

6 **2. Joint Stipulation**

7 42. On November 8, 2012, ALECA and Q Link filed a Stipulation in the docket. In the
8 Stipulation, to address the potential concerns expressed by ALECA, Q Link agreed not to provide
9 Lifeline service to eligible residents residing on Federally-recognized Tribal Lands. In addition, Q
10 Link agreed that its Lifeline enrollment application for Arizona will require an applicant to provide
11 a street address and include a provision that requires an applicant to self-certify under penalty of
12 perjury that they do not reside on Federally-recognized Tribal Lands.

13 **LINK UP**

14 43. In its application, Q Link requested Link Up support. Federal Link Up Assistance
15 pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional, wireline
16 telephone or activation fee for a wireless telephone for a primary residence. It also allows
17 participants to pay any remaining amount owed on a deferred schedule, interest-free.

18 44. In the Lifeline Reform Order, the FCC eliminated the Link Up program, effective
19 April 1, 2012, with the exception of high cost ETCs serving Tribal lands.³⁹ In its Amendment to
20 its Application, Q Link withdrew its request for Link Up support.⁴⁰ Given the FCC’s elimination
21 of the Link Up program on non-tribal lands and Q Link’s withdrawal of its request for Link Up
22 support, the Link Up support issue is moot and no longer needs to be addressed by this
23 Commission.

24 **STAFF RECOMMENDATIONS**

25 45. In addition to the conditions set forth by the FCC, Staff recommends Q Link’s
26 Application for designation as an ETC be granted subject to the following conditions:

27
28 ³⁹ See Lifeline Reform Order, ¶245 and footnote 652.

⁴⁰ Amendment to Application, Page 1.

- a. Q Link shall file a tariff, in this docket, setting forth the rates, terms and conditions for its Lifeline service within thirty (30) days of a Commission Order in this matter;
- b. Q Link shall notify the Commission of any future changes to its rates, terms and/or conditions regarding its Lifeline offerings and file such changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;
- c. Q Link shall make available Lifeline services to qualifying low-income applicants in its ETC service area no later than ninety (90) days after a Commission decision in this matter and shall concurrently notify the Commission, by making a filing in Docket Control, in this docket, of the commencement date for such services;
- d. Q Link shall apprise the Commission of any customer complaints that may arise from its ETC service offerings by making a filing in Docket Control in this docket;
- e. Q Link shall provide a regulatory contact to the Commission by making a filing in Docket Control in this docket;
- f. In the event that Q Link requests to relinquish its ETC status and no longer provide Lifeline services, it must provide notice to both the Commission and its customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
- g. Q Link shall submit in Docket Control an annual report by April 15th of each year, beginning April 15, 2014, that contains its total number of Lifeline subscribers, total amount of Federal USF support received and an affidavit stating that the Lifeline discounts or the equivalent are equal to the amount of total Federal USF support per line. The annual filing shall be submitted as a compliance item in this docket;
- h. Q Link shall submit in Docket Control, as a compliance item in this docket, a quarterly report detailing the total number of Lifeline customers, the total number of customers removed from the customer base due to 60-day inactivity, the number of customers removed from the customer base due to annual verification and the total number of customers who voluntarily relinquished Lifeline service. In compiling the data for these reports, Q Link must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the de-enrollment policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute usage. The quarterly report should be submitted as a compliance item in this docket on the 15th of the month following the end of each calendar quarter, beginning July 15, 2013, or with the first complete quarter following the offering of prepaid Lifeline calling plans, whichever is earlier;
- i. In the event of a transfer of control that involves Q Link, a new ETC petition shall be filed with the Commission. This will ensure ETCs undergoing reorganization remain financially viable and able to provide the supported services throughout the designated service areas as originally approved by the Commission; and

j. Q Link shall not expand its Lifeline service beyond the designated service area specified in this application without acquiring ETC designation from the Commission to serve the additional area.

CONCLUSIONS OF LAW

1. Q Link Wireless, LLC is a telecommunications company as defined in A.R.S. § 40-201(46) and is a “telecommunications carrier” as defined in 47 U.S.C. § 153(51). Q Link is also a reseller of Commercial Mobile Radio Service as defined in 47 U.S.C. § 20.3 and A.A.C. R14-2-1201(8).

2. The Commission has jurisdiction over the subject matter of the application.

3. Under 47 U.S.C. § 214(e)(1), a common carrier that is designated as an Eligible Telecommunications Carrier must, throughout its designated service area, offer the services that are supported by the Federal Universal Service Support mechanisms either by using its own facilities or a combination of its own facilities and resale of another carrier's services. The carrier must also advertise the availability of such services and the rates for the services using media of general distribution.

4. Under 47 U.S.C. § 214(e)(2), the Commission must establish the geographic area for the purposes of determining universal service obligations and support mechanisms. Q Link's application applies to the designated service area consisting of the zip codes listed in Attachment 1, excluding Federally-Recognized Tribal Lands located within the state of Arizona.

5. Q Link meets the requirements for ETC designation under 47 U.S.C. § 214 and C.F.R. § 54.201 *et seq.*, subject to Q Link's compliance with the conditions set forth in Finding of Fact No. 45 herein.

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ORDER

IT IS THEREFORE ORDERED that the application of Q Link Wireless, LLC for designation as an Eligible Telecommunications Carrier pursuant to U.S.C. § 214(e)(1) for the purpose of receiving federal universal service support in Arizona, for the service area set forth in Attachment 1 attached hereto and incorporated herein by reference, be and hereby is approved, subject to Q Link Wireless, LLC's compliance with the conditions set forth in Finding of Fact No. 45 above.

IT IS FURTHER ORDERED that if Q Link Wireless, LLC does not comply with the requirements of Finding of Fact No. 45, its designation as an ETC may be revoked after due process.

IT IS FURTHER ORDERED that this Decision shall become effective immediately.

BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

CHAIRMAN

COMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, JODI JERICH, Executive Director of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this _____ day of _____, 2013.

JODI JERICH
EXECUTIVE DIRECTOR

DISSENT: _____

DISSENT: _____

SMO:LLM:sms\MAS

Decision No. _____

1 SERVICE LIST FOR: Q LINK WIRELESS, LLC.
2 DOCKET NO. T-20824A-11-0446

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ATTACHMENT 1

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85001	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85002	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85003	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85004	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85005	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85006	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85007	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85008	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85009	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85010	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85011	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85012	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85013	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85014	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85015	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85016	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85017	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85018	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85019	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85020	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85021	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85022	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85023	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85024	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85025	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85026	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85027	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85028	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85029	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85030	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85031	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85032	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85033	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85034	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85035	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85036	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85037	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85038	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85040	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85041	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

ATTACHMENT 1

Docket No. T-20824A-11-0446

Q LINK WIRELESS, LLC				Coverage Area by Zip Code		Tribal Lands Covered
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	
85042	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85043	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85044	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85045	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85046	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85048	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85050	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85051	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85053	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85054	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85055	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85060	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85061	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85062	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85063	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85064	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85065	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85066	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85067	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85068	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85069	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85070	Laveen	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85071	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85072	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85074	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85075	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85076	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85078	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85079	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85080	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85082	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85083	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85085	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85086	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85087	New River	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85096	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85097	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85098	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85099	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85117	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85118	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85119	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85120	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85121	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.	
85122	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85123	Arizona City	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85127	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85128	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.	
85130	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85131	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85132	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85138	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85139	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85140	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85141	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85142	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85143	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85145	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85172	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85178	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85190	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85191	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85193	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85194	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85201	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85202	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85203	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85204	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85205	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85206	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85207	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85208	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85209	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85210	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85211	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85212	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85213	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85214	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85215	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85216	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85217	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85218	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85219	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85220	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85221	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85222	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority	
85223	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85224	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85225	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85226	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.	
85227	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85228	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85230	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85231	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority	
85232	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85233	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85234	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85236	Higley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85238	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85239	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85240	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85241	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85242	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85243	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85244	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85245	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85246	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85247	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85248	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.	
85249	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85250	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85251	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85252	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85253	Paradise Valley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85254	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85255	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85257	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85258	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85259	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85260	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85261	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85263	Rio Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85266	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85267	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85268	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85269	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85271	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85272	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85274	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85275	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85277	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85278	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85280	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85281	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85282	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85283	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85284	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85285	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85286	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85287	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85291	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85293	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85294	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85295	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85296	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85297	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85298	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85299	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85301	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85302	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85303	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85304	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85305	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85306	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85307	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85308	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85309	Luke AFB	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85310	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85311	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85312	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC				
		Coverage Area by Zip Code				
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85318	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85322	Arlington	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85323	Avondale	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85326	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85327	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85328	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85329	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85331	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85333	Dateland	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85334	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85335	El Mirage	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85336	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85337	Gila Bend	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85338	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85339	Laveen	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85340	Litchfield Park	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85342	Morristown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85343	Palo Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85345	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85346	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85349	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85350	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85351	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85352	Wellton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85353	Tolleson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85354	Tonopah	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85355	Waddell	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85358	Wickenburg	AZ	Phoenix_AZ	PHXWCB928	WICKENBURG, AZ 928	
85359	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85360	Lake Havasu City	AZ	LakeHavasuCity_AZ	NMXMLHC520	LAKE HAVASU CITY, NV 520	
85361	Wittmann	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85363	Youngtown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85364	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85365	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85366	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85367	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85369	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520	
85372	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85373	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85374	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

ATTACHMENT 1

Docket No. T-20824A-11-0446

			Q LINK WIRELESS, LLC				
			Coverage Area by Zip Code				
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85375	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85376	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85377	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85378	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85379	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85380	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85381	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85382	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85383	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85385	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85387	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85388	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85392	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85395	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85396	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85502	Globe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85532	Miami	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.	
85547	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85553	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85603	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520		
85605	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520		
85606	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520		
85608	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520		
85609	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520		
85613	Fort Huachuca	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520		
85614	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85616	Huachuca City	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520		
85617	MC Neal	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520		
85618	Mammoth	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85619	Mount Lemmon	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85620	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520		
85622	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85623	Oracle	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85626	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520		
85627	Benson	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520		
85628	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520		
85629	Sahuarita	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85630	Saint David	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520		
85631	San Manuel	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85632	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520		

ATTACHMENT 1

				Q LINK WIRELESS, LLC				
		Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered		
85635	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520			
85636	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520			
85640	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85641	Vail	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85644	Willcox	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520			
85645	Amado	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85646	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85648	Rio Rico	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520			
85650	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520			
85652	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85653	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85654	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85655	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520			
85658	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85662	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520			
85670	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520			
85701	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85702	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85703	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85704	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85705	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85706	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85707	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85708	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85709	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85710	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85711	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85712	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85713	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85714	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85715	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85716	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85717	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85718	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85719	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85721	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85722	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85723	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85724	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			
85725	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520			

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC				
		Coverage Area by Zip Code				
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85726	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85728	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85730	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85731	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85732	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85733	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85734	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85735	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85737	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85738	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85739	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85740	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85741	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85742	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85743	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85744	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85745	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85746	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85747	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85748	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85749	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85750	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85751	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85752	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85754	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85755	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85756	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85757	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85942	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86002	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86003	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86004	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86011	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Frontier/Navajo
86015	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86017	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86018	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86023	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86025	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86028	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86029	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
86032	Winslow	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86301	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86302	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86304	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86312	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86313	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86314	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86315	Prescott Valley	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86320	Ash Fork	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86322	Camp Verde	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86325	Cornville	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86326	Cottonwood	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86327	Dewey	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86329	Dewey	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86330	Prescott	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86331	Clarkdale	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86333	Mayer	AZ	Flagstaff_AZ	NMXPRES520	PRESCOTT, AZ 520		
86335	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86339	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86340	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86341	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86342	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86351	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520		
86402	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520		
86403	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520		
86404	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520		
86405	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520		
86409	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520		
86412	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520		
86413	Golden Valley	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520		
86426	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.	
86427	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.	
86429	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520		
86430	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520		
86431	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520		
86436	Topock	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520		
86438	Bullhead City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520		
86439	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520		
86440	Mohave Valley	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.	
86446	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520		

ATTACHMENT 1

Docket No. T-20824A-11-0446

		Q LINK WIRELESS, LLC				
		Coverage Area by Zip Code				
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
86506	Ganado	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86512	Chambers	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86555	Douglas	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	